PURPOSE. To teach Army environment of care (EC) subject matter experts how to write effective EC management plans. This training will prevent unnecessary Joint Commission (JC) findings as well as provide military treatment facilities with a coordinated, organized, and proactive method for protecting patients, staff, and visitors from harm.

See Appendix A to test your knowledge of the key principles for writing JC-compliant EC management plans.

POINTS OF MAJOR INTEREST

What?
The EC management plans (MPs) are a means used to tell the JC surveyors and your hospital leaders and staff how you manage the myriad of risks related to the six functional areas within the physical environment (PE). These functional areas are safety, security, hazardous materials and waste, fire safety, medical equipment, and utility systems. The MPs provide you with a coordinated, organized, and proactive method for protecting patients, staff, and visitors from harm. You can use these same MPs to track and document your performance goals and objectives; compliance with relevant regulations, standards, and guidelines; and the effectiveness of your risk management strategies.

Why?
The JC Standard EC.01.01.01, elements of performance 3, 4, 5, 6, 7, and 8 states that accredited organizations must have written EC MPs. Standard EC.04.01.01, element of performance 15, states that organizations must evaluate their EC MPs annually. These standards have been included in the EC Chapter since the mid 1990’s.

Who?
Logically, the individuals having responsibility for managing the six functional areas should write the corresponding MPs since they are the most knowledgeable about the relevant regulations, standards, and guidelines as well as the local policies, procedures, and work practices. For example, the safety manager is the best qualified to write the safety MP and likewise, the security manager is the best qualified to write the security MP. Some MPs must be written jointly by more than one subject
matter expert to guarantee that all of the elements of performance are accurately addressed in the plan. The fire safety MP is such an example: the safety manager knows the precautions the hospital has in place to prevent or reduce the likelihood of a fire that may result in death, injury, or property damage, while the facilities manager knows the processes in place for inspecting, testing, and maintaining the fire safety equipment and building features.

When?
The MPs must be revised when there are significant changes in regulation, policy, procedures, work practices, and patient care locations, equipment, and services. Also, if your organization moves to another location, for example, a newly constructed hospital building, you must modify your MPs so that they are applicable to the new facility. The revised MPs must be in place before any patients are seen or treated at the new facility.

How?
There is no one specific way of writing MPs. You can write them individually, one MP for each of the six functional areas, or you can combine them into a single document. Another approach to reduce wordiness is to write a separate document that addresses the common key topics that apply to all of the MPs in lieu of duplicating the information in each of the MPs. The common topics are risk assessment, staff education and training, information collection and evaluation, performance monitoring, and annual evaluation. Finally, readers will find your MPs easier to review, comprehend, and use when you follow an outline or template so that topics are addressed in a consistent sequence. A good outline or template to follow is: (1) scope, (2) objectives, (3) responsibilities (4) risk assessment, (5) staff education and training, (6) elements of performance, (7) emergency response, (8) information collection and evaluation, (9) performance monitoring, and (10) annual evaluation.

Your MPs must be specific to your facility. If you have outlying clinics located elsewhere on post or on other installations, you must choose whether to include these clinics in your MPs, citing the differences in policy and procedures, or to require the outlying clinics to develop their own unique MPs.

Your MP should be brief, but educational. Ideally, your MPs should be less than 10 pages in length. You must address the all of the EC standards and elements of performance. When an element of performance does not apply, do not skip over it, simply state that the element of performance does not apply to your facility. Also, avoid the common mistake of citing the standards and elements of performance verbatim. Instead, provide a descriptive summary of how you comply with each standard and element of performance. For example, briefly describe the processes used to minimize or manage risk; identify who is responsible for completing important tasks, how often those tasks are completed, and how you maintain required documentation. You may
direct readers to more detailed information by referencing your local policies, regulations, and standing operating procedures in your text or by listing them in an appendix. All referenced documents must be readily accessible should readers need to refer to them.

To provide a comprehensive picture of how you manage risk within the PE, point out instances where your local policies, procedures, and work practices are more stringent than the JC’s standards. For example, your local fire department may require you to conduct fire quarterly drills in your outlying clinics which are more stringent than the JC’s requirement to conduct annual fire drills in stand-alone business occupancies. Finally, you should address other related JC standards and elements of performance in your MPs, such as management of regulated medical waste from the Infection Prevention and Control Chapter, management of hazardous drugs from the Medication Management Chapter, and decontamination of accident victims from the Emergency Management Chapter.

Your EC/Safety Committee should review and approve your MPs annually. The following checklist is a good test to determine whether your MPs measure up.

**Table 1. Sample Checklist for Annual Review of Environment of Care Management Plans**

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>1  Standardized is format used</td>
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<tr>
<td>2  Subject matter experts are involved in MP development</td>
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<td>3  Responsibilities are defined</td>
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<td>4  Scope is defined</td>
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<td>5  Objectives are defined</td>
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<td>6  Methods for determining effectiveness are defined</td>
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<td>7  Methods for monitoring performance are defined</td>
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<td>8  Process for performing the annual review is defined</td>
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<tr>
<td>9  Outlying clinics are included or they have their own MPs</td>
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<tr>
<td>10 Information is consistent with work practices</td>
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<td>11 All elements of performance are addressed in adequate detail</td>
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<td>12 Relevant standards from other chapters are considered</td>
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<tr>
<td>13 The plan identifies the strictest authority having jurisdiction (AHJ)</td>
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<tr>
<td>14 Relevant policies, regulations, and standing operating procedures are referenced and readily accessible</td>
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<tr>
<td>15 Each accredited site has a copy of the written EC MPs</td>
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</table>
The last step after the EC/Safety Committee reviews and approves your MPs is to distribute a copy to every accredited site, including the outlying clinics.

**Need more information?**
EC Management Plan Templates are available for download on the U.S. Army Public Health Command Website at:
http://phc.amedd.army.mil/topics/workplacehealth/ms/Pages/EnvironmentofCareTemplates.aspx

Questions can be directed to the U.S. Army Institute of Public Health, Industrial Hygiene and Medical Safety Management Program at 410-436-5453 or electronic mail at rose.m.overturf.civ@mail.mil

**Prepared by:** Industrial Hygiene Medical Safety Management Program  
**Dated:** 1 May 2014
Appendix A

Test Your Knowledge

1. Environment of Care (EC) Management Plans are required for what functional areas?

   c. Safety, Medical Equipment and Utility Systems.
   d. All of the above.

2. Every accredited facility must have six individual EC Management Plans.

   a. True
   b. False

3. Which of the following are qualities of a well-written EC Management Plans?

   a. Management Plans are unique to the facility.
   b. Subject matter experts were involved with the development of the Management Plans.
   c. The Management Plans address all of the EC standards and elements of performance.
   d. All of the above.

4. All referenced documents should be readily accessible should readers need to refer to them for more detailed information.

   a. True
   b. False

5. The Joint Commission standard stating each accredited organization must have written EC Management Plan is _____________.

   The answers are: (1) c (2) b (3) d (4) a (5) EC.01.01.01.